

**Exhibit C**

**Additional Provisions Proposed By Defendants Diaz and Rezk  
and Opposed By the Securities and Exchange Commission**

- A. Initial Disclosures. The parties shall exchange the initial disclosures on or before February 17, 2023. The parties shall make a production of “all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defense,” pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), by no later than March 10, 2023. For the SEC, this shall include all documents and transcripts of testimony obtained in connection with the investigation captioned *In the Matter of Cool Holdings, Inc.* (NY-9960).
- B. Subpoenas. All subpoenas under Fed. R. Civ. P. 45 must be served no later than 30 days prior to the date of the close of discovery set forth in item 6 below.